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Attorneys for Plaintiff,
SUSAN MULLIN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SUSAN MULLIN,

Plaintiff,

VS.

AMERICAN INCOME LIFE INSURANCE COMPANY.

Defendants

CASE NO. 17-cv-05223-RS

**STIPULATION TO CONTINUE DATES AS
MODIFIED BY THE COURT**

Plaintiff and defendants, by and through their respective counsel of record, hereby stipulate as follows:

Whereas, the discovery cut-off date is presently set for December 7, 2018;

Whereas, events (deemed critical to the resolution of the case by Plaintiff) took place after the filing of the Plaintiff's complaint and Defendant's answer, which altered the nature of the dispute;

Whereas, additional discovery is required by both parties to properly litigate this dispute;

Whereas, the parties also have reigned settlement discussions and will be mediating this case, and are in the process of agreeing on a mediator and satisfactory date;

Whereas, the parties are desirous of continuing all discovery deadlines for ninety (90) days as follows:

- All non-expert discovery to be completed by March 7, 2019;
- Parties to designate experts according to FRCP 26(a)(2) by February 5, 2019
- Parties to designate supplemental and rebuttal experts according to FRCP 26(a)(2) by March 7, 2019
- Parties to complete all expert discovery according to 26(b)(4) by April 7, 2018;

Whereas, the parties are further desirous of continuing the trial dates accordingly:

- Final pretrial conference to be held on ~~May 23, 2019~~ **June 26, 2019**.
- Jury trial to commence on ~~June 10, 2019~~ **July 8, 2019**.

IT IS SO STIPULATED and respectfully submitted by counsel listed below.

Dated: KANTOR & KANTOR, LLP

By _____
Andrew M. Kantor
Glenn R. Kantor
Attorneys for Plaintiff
SUSAN MULLIN

Dated: HINSHAW & CULBERTSON LLP

By: _____
Royal F. Oakes
Attorneys for Defendant
AMERICAN INCOME LIFE INSURANCE
COMPANY

Filer's Attestation: Pursuant to Local Rule 5-4.3.4(a)(2)(i) regarding signatures, Andrew M. Kantor hereby attests that concurrence in the filing of this document and its content has been obtained by all signatories listed.

ORDER

Having reviewed the parties' Stipulation to Continue the Discovery Cutoff Date, and for Good Cause Shown,

IT IS HEREBY ORDERED as follows:

That the cutoff date for discovery will be continued an additional ninety (90) days from December 7, 2018 to March 7, 2019.

DATED: November 8, 2018



Richard Seaborg

Honorable Richard Seeborg
U.S. District Court Judge

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